

Paul T. Trimmer  
Nevada State Bar No. 9291  
Lynne K. McChrystal  
Nevada State Bar No. 14739  
**JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Fax: (702) 921-2461  
Email: [paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
Email: [lynne.mcchrystal@jacksonlewis.com](mailto:lynne.mcchrystal@jacksonlewis.com)

*Attorneys for Defendants*  
*Unforgettable Coatings, Inc.;*  
*Unforgettable Coatings of Idaho LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JOSE ISMAEL ZUNIGA, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

UNFORGETTABLE COATINGS INC.;  
UNFORGETTABLE COATINGS OF IDAHO  
LLC; DOES 1 through 50; inclusive.

Defendants.

Case No.: 2:21-cv-01221-JCM-VCF

**STIPULATION TO EXTEND DEADLINE  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"), through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson Lewis P.C., that Defendants shall have an extension up to and including August 6, 2021, in which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served on or about June 8, 2021.

2. Defendants' filed their Petition for Removal of Civil Action from State Court on June 29, 2021.

3. Defendants' Answer is currently due July 16, 2021.

4. This is the second request for an extension of time for Defendants to file a response to Plaintiff's Complaint.

5. This request is made in good faith and not for the purpose of delay.

6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 16th day of July, 2021.

GABROY LAW OFFICES

JACKSON LEWIS P.C.

/s/ Christian Gabroy  
Christian Gabroy, State Bar No. 8805  
Kaine Messer, State Bar No. 14240  
Dominique Bosa-Edwards, State Bar No. 15705  
170 S. Green Valley Pkwy., Suite 280  
Henderson, NV 89012


/s/ Lynne K. McChrystal  
Paul T. Trimmer, State Bar No. 9291  
Lynne K. McChrystal, State Bar No. 14739  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101

*Attorneys for Defendants*

*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED

  
\_\_\_\_\_  
U.S. Magistrate Judge

Dated: 7-16-2021  
\_\_\_\_\_